

1 G. HOPKINS GUY, III (State Bar No. 124811)  
hopguy@orrick.com  
2 I. NEEL CHATTERJEE (State Bar No. 173985)  
nchatterjee@orrick.com  
3 MONTE COOPER (State Bar No. 196746)  
mcooper@orrick.com  
4 THERESA A. SUTTON (State Bar No. 211857)  
tsutton@orrick.com  
5 YVONNE P. GREER (State Bar No. 214072)  
ygreer@orrick.com  
6 ORRICK, HERRINGTON & SUTCLIFFE LLP  
1000 Marsh Road  
7 Menlo Park, CA 94025  
Telephone: 650-614-7400  
8 Facsimile: 650-614-7401

9 Attorneys for Plaintiffs  
10 FACEBOOK, INC. and MARK ZUCKERBERG

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN JOSE DIVISION  
14

15 FACEBOOK, INC. and MARK  
16 ZUCKERBERG,

17 Plaintiffs,

18 v.

19 CONNECTU, INC. (formerly known as  
20 CONNECTU, LLC), CAMERON  
WINKLEVOSS, TYLER WINKLEVOSS,  
21 DIVYA NARENDRA, PACIFIC  
NORTHWEST SOFTWARE, INC.,  
22 WINSTON WILLIAMS, WAYNE CHANG,  
and DAVID GUCWA AND DOES 1-25,

23 Defendants.  
24  
25  
26  
27  
28

Case No. 5:07-CV-01389-RS

**FACEBOOK'S ADMINISTRATIVE  
REQUEST PURSUANT TO LOCAL  
CIVIL RULE 79-5 (D) TO FILE  
UNDER SEAL THE REPLY  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT OF  
FACEBOOK'S MOTION TO  
COMPEL PACIFIC NORTHWEST  
SOFTWARE AND WINSTON  
WILLIAMS TO PROVIDE  
COMPLETE AND SUPPLEMENTAL  
RESPONSES TO FACEBOOK'S  
FIRST SET OF INTERROGATORIES  
NOS. 3 AND 4 AND EXHIBITS I AND  
K TO THE DECLARATION OF  
MONTE COOPER IN SUPPORT OF  
FACEBOOK'S MOTION TO  
COMPEL**

Date: November 28, 2007  
Time: 9:30 a.m.  
Judge: Honorable Richard Seeborg

1 Pursuant to Civil L.R. 7-11 and 79-5 (d), Facebook respectfully submits this  
2 administrative request asking the Court to file under seal the Reply Memorandum Of Points And  
3 Authorities In Support Of Facebook's Motion To Compel Pacific Northwest Software And  
4 Winston Williams To Provide Complete And Supplemental Responses To Facebook's First Set  
5 Of Interrogatories Nos. 3 And 4 and Exhibits I and K To the Declaration of Monte M. F. Cooper  
6 In Support of Facebook's Reply Memorandum In Support of the Motion To Compel.

7 The parties entered into, and the California Superior Court issued, a Stipulated Protective  
8 Order on January 23, 2006, which prohibits either party from filing in the public record any  
9 documents that have been designated as "Confidential" or "Highly Confidential" pursuant to the  
10 Protective Order.

11 The Reply Memorandum Of Points And Authorities In Support Of Facebook's Motion To  
12 Compel Pacific Northwest Software And Winston Williams To Provide Complete And  
13 Supplemental Responses To Facebook's First Set Of Interrogatories Nos. 3 And 4 contains direct  
14 quotes from a document produced by PNS. The document has been marked Highly Confidential  
15 by PNS pursuant to the Protective Order entered in this matter, and hence portions of the Reply  
16 Memorandum Of Points And Authorities In Support Of Facebook's Motion To Compel Pacific  
17 Northwest Software And Winston Williams To Provide Complete And Supplemental Responses  
18 To Facebook's First Set Of Interrogatories Nos. 3 And 4 is subject to Local Civil Rule 79-5(d).  
19 Facebook takes no position as to whether the excerpts from the document produced by PNS  
20 referred to in the Reply Memorandum of Points and Authorities in Support of Facebook's Motion  
21 to Compel is highly confidential.

22 **Exhibit I** to the Declaration of Monte M. F. Cooper filed in Support of Facebook's Reply  
23 Memorandum of Points and Authorities In Support Of The Motion To Compel Pacific Northwest  
24 Software And Winston Williams To Provide Complete And Supplemental Responses To  
25 Facebook's First Set Of Interrogatories Nos. 3 And 4 is a copy of relevant excerpts from Winston  
26 Williams' June 19, 2007 deposition. The deposition testimony has been marked Highly  
27 Confidential by Winston Williams pursuant to the Protective Order entered in this matter, and  
28 hence is subject to Local Civil Rule 79-5(d). Facebook takes no position as to whether the

deposition testimony of Winston Williams is confidential.

**Exhibit K** to the Declaration of Monte M. F. Cooper filed in Support of Facebook's Reply Memorandum of Points and Authorities In Support Of The Motion To Compel Pacific Northwest Software And Winston Williams To Provide Complete And Supplemental Responses To Facebook's First Set Of Interrogatories Nos. 3 And 4 is a copy of a relevant exhibit from PNS's production. This document has been marked Highly Confidential by PNS pursuant to the Protective Order entered in that matter, and hence is subject to Local Civil Rule 79-5(d). Facebook takes no position as to whether this document is confidential.

Dated: November 14, 2007

Orrick, Herrington & Sutcliffe LLP

/s/ Yvonne P. Greer /s/  


---

Yvonne P. Greer  
Attorneys for Plaintiffs  
FACEBOOK, INC. AND MARK ZUCKERBERG

## CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on November 14, 2007.

Respectfully submitted,